

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
High Cost Universal Service Support	)	WC Docket No. 05-337
	)	
Federal-State Joint Board on Universal	)	CC Docket No. 96-45
Service	)	
	)	
Request for Review of Decision of Universal	)	
Service Administrator by Corr Wireless	)	
Communications, LLC	)	
	)	
	)	
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	)	

**REPLY COMMENTS OF GVNW CONSULTING, INC.**

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## **INTRODUCTION**

GVNW Consulting, Inc. (GVNW) is a management consulting firm that provides a wide variety of consulting services, including regulatory and advocacy support on issues such as universal service, intercarrier compensation reform, and strategic planning for communications carriers in rural America.

The purpose of these reply comments is to respond to the Public Notice in the above-captioned matter released September 21, 2010. In the comment round, parties offered positions that could have been anticipated from prior filings. The US Telecom Association suggested at page 3 of their comments: *“The Commission has already correctly concluded ...that supporting multiple ETCs serving a particular geographic area is a poor use of scarce universal service funds.”*

A representative opposing view was offered by the Rural Independent Competitive Alliance (RICA), which stated at page 2 of its comments that *“because the Commission has failed to revoke the identical support rule, even though it has long had an adequate record upon which to do so, RICA members have seen substantial reductions of as much as 50% in their support.”*

In the following section, we offer an additional alternative for the Commission to consider in its menu of options on this issue.

## **AN ALTERNATIVE USE OF THE FUNDS SHOULD BE CONSIDERED AS WELL AS THE PROPOSALS OFFERED IN THE COMMENT ROUND**

In the October 14, 2010 NPRM on USF Mobility Fund issues, Commissioner Baker expressed a concern in her accompanying statement *“as to whether a one-time support mechanism will prove sustainable...”*

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We take that concern into proposals that would move away from providing federal universal service support for existing wireline service in the highest cost to serve areas of the country and respectfully suggest that some percentage of the funds being debated (e.g., 25%) be set aside for use in providing federal universal service support for the operations and maintenance portion of existing networks in the highest cost to serve parts of the nation.

Respectfully submitted

*Via ECFS on 10/19/10*

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